

NJ-RMP Instructions, How to Complete and Submit the NJ-RMP

Appendix B - New Jersey RMP Data Entry User Manual

Revised May 13, 1999

I. Introduction

A. General Information

New Jersey's Toxic Catastrophe Prevention Act (TCPA) and the TCPA rule at N.J.A.C. 7:31-7.2(a) specify four pieces of registration information that are not included in the federal RMP*Submit. The New Jersey RMP Data Entry application was developed to provide the method for owners or operators of stationary sources subject to the TCPA rule to submit this additional registration information to New Jersey Department of Environmental Protection (NJDEP). The New Jersey RMP Data Entry application is used in conjunction with the United States Environmental Protection Agency's (USEPA's) RMP*Submit application.

Also, New Jersey is seeking delegation of the federal 112(r) accidental release prevention program and will regulate some chemicals that are not listed by USEPA in the federal rule at 40 CFR 68.130. As a result, those additional chemicals will not be part of the federal program and will not be subject to federally enforceable RMP requirements. At New Jersey's request, USEPA has included New Jersey's additional chemicals in RMP*Submit's "pick list" of chemicals so that New Jersey facilities may use RMP*Submit for reporting on those chemicals to New Jersey. (All state-only regulated chemicals are identified as such in the chemical pick list.) However, an RMP submitted to USEPA should only contain information on federally regulated chemicals.

Facilities in New Jersey that have both federally listed *and* state-only listed chemicals in more than threshold quantities must fill out two RMPs: one to be sent to USEPA and one to be sent to NJDEP. The RMP to be sent to USEPA should include only information relating to federally listed chemicals (this applies to chemicals and threshold quantities specified at 40 CFR 68.130). The RMP sent to New Jersey should include information on *both* federally regulated and state-only regulated chemicals since both are subject to the TCPA rules and will be equally enforced when USEPA delegates implementation of the federal accidental release prevention program to NJDEP.

It is important that the RMP submitted to USEPA not include the New Jersey-only information for two reasons. First, USEPA's electronic program for processing RMPs will not be able to process RMPs containing information on New Jersey's additional chemicals. Second, certain information, such as the worst-case scenario submitted for compliance with the federal USEPA program cannot be based on a New Jersey-only chemical. For example, the overall worst-case scenario for a facility with both federally listed and state listed chemicals might involve a state listed chemical, but

the federally required RMP must address the worst-case scenario for the federally listed chemicals.

In conclusion, NJDEP recommends that TCEPA facilities with both federally listed and state listed chemicals first fill out their federally enforceable RMP with information pertaining to the federally listed chemicals and thresholds. Using this copy of the RMP as the basis for filling out the NJ RMP, revisions should be made so that information covering both federally listed and state listed chemicals is included. The NJ facility owner/operator should then run the NJ RMP Data Entry application using the NJ RMP version. Finally, the diskette containing the federal RMP information should be submitted to USEPA, and the diskette containing the state RMP information should be submitted to NJDEP. It is recommended that both diskettes be submitted at the same time since the RMP has to be updated at a minimum every five years.

The detailed instructions explaining how to make the New Jersey RMP submittal are given in Parts II., III., and IV. of this Appendix B.

B. Substances Listed as Solutions or Mixtures with Concentration Cutoffs

Some chemicals regulated by NJDEP and USEPA are specified as solutions or mixtures with different concentration cutoffs. These include aqueous ammonia (TCEPA rule 28% NH_3 , USEPA rule 20 % NH_3), hydrochloric acid (TCEPA rule 36% HCl , USEPA rule 37% HCl), hydrofluoric acid (TCEPA rule 70% HF , USEPA rule 50% HF), nitric acid (TCEPA rule 94% HNO_3 , USEPA rule 80% HNO_3), and oleum (TCEPA rule 65% free SO_3 , USEPA rule fuming sulfuric acid). There are also two other substances, nitric oxide and sulfur dioxide, for which TCEPA specifies a cutoff at 10% by volume but USEPA lists only as the anhydrous substance.

Further, each of the above substances is included as separate substances in the RMP*Submit "pick list" because NJDEP and USEPA have different ways of applying the threshold quantity (TQ) to substances with a specified concentration. For example, for 28% aqueous ammonia NJDEP applies its 19,000 pound TQ towards the total weight of the solution, whereas USEPA applies its 20,000 pound TQ towards the amount of the solute in the solution, the anhydrous ammonia. The following example shows three cases of how the different threshold and RMP*Submit "pick list" substance name should be applied for aqueous ammonia when making the RMP submittals to USEPA and NJDEP.

Aqueous ammonia example

RMP*Submit "Pick List"

New Jersey substance name: ammonium hydroxide (aqueous ammonia, 28% by weight or more NH_3) (Note: This is listed in the TCEPA rule as ammonia (aqueous, 28% by weight or more NH_3) CAS # 1336-21-6)

RMP*Submit "Pick List"

federal substance name: ammonia (conc 20% or greater)
CAS # 7664-41-7

Case 1

An owner/operator (o/o) handles aqueous ammonia with a weight percent that is greater than or equal to 20% but less than 28%.

Example: 25% aqueous ammonia, 90,000 pounds inventory of total solution

USEPA TQ = 20,000 pounds/0.25 = 80,000 pounds of total solution

Regulated pursuant to federal rule, not by TCPA rule

RMP*Submit:	<u>"Pick List" Substance</u>	<u>Maximum Inventory</u>
	ammonia (conc 20% or greater)	22,500 (of the solute)

The RMP should be submitted to both USEPA and NJDEP.

Case 2

An o/o handles aqueous ammonia with a weight percent that is greater than or equal to 28%; the inventory is above TCPA's TQ but below USEPA's TQ.

Example: 30% aqueous ammonia, 50,000 pounds inventory of total solution

USEPA TQ = 20,000 pounds/0.3 = 66,667 pounds of total solution

TCPA TQ = 19,000 pounds of total solution

Regulated pursuant to TCPA rule, not by the federal rule.

RMP*Submit:	<u>"Pick List" Substance</u>	<u>Maximum Inventory</u>
	ammonium hydroxide (aqueous ammonia, 28% by weight or more NH ₃)	50,000 (total solution)

The RMP should be submitted to NJDEP only.

Case 3

An o/o handles aqueous ammonia with a weight percent that is greater than or equal to 28%; the inventory is above TCPA's TQ and also above USEPA's TQ.

Example: 30% aqueous ammonia, 75,000 pounds inventory of total solution

USEPA TQ = 20,000 pounds/0.3 = 66,667 pounds

TCPA TQ = 19,000 pounds

Regulated pursuant to TCPA rule and federal rule.

RMP*Submit:	<u>Substance</u>	<u>Maximum Inventory</u>
(To USEPA)	ammonia (conc 20% or greater)	22,500 (solute)
(To NJDEP)	ammonium hydroxide (aqueous ammonia, 28% by weight or more NH ₃)	75,000 (total solution)

Similar cases occur for hydrofluoric acid, nitric acid, and oleum. For hydrochloric acid, the cases are slightly different because the HCl percent cutoff for TCPA is lower than USEPA's, but there is still one case where RMP*Submit would need to be submitted to USEPA and NJDEP under the different concentration listings. Cases like these may also occur for nitric oxide and sulfur dioxide because of the TCPA rule's 10% by volume cutoff and different TQ's.

C. Liquefied Petroleum Gas Components

It should be noted that the components of liquefied petroleum gas (LPG) are not included in the TCPA list of chemicals as specified at N.J.A.C. 7:31-6.1(a)5ii. The LPG components are propane (CAS No. 74-98-6), propylene (CAS No. 115-07-1), butanes (normal butane (CAS No. 106-97-8) or isobutane (CAS No. 75-28-5)), and butylenes (1-butene (CAS No. 106-98-9), 2-butene (CAS No. 107-01-7), butene (CAS No. 25167-67-3), 2-butene-cis (CAS No. 590-18-1), 2-butene-trans (CAS No. 625-64-6), and 2-methylpropene (CAS No. 115-11-7)). Since NJDEP is not regulating the components of LPG under the TCPA rule, information containing the LPG component chemicals should not be included on the RMP*Submit to NJDEP. However, New Jersey does regulate the LPG components if they are part of a mixture with another flammable substance that is regulated by New Jersey. For example, propane, which is an LPG component and excluded from the list of flammable substances in the TCPA rule, may be part of a mixture with ethane, which is regulated by the TCPA rule. The entire mixture should then be listed as the flammable substance on RMP*Submit, and the individual components of the mixture should be listed. This information should be included in the RMP submitted to NJDEP.

D. Hydrogen Fluoride (anhydrous) and Formaldehyde (gas)

The RMP*Submit pick list of chemicals has been updated to add hydrogen fluoride (anhydrous), CAS #7664-39-3, and formaldehyde (gas), CAS # 50-00-0, as New Jersey-only chemicals. Anhydrous hydrogen fluoride (HF) is included in New Jersey's list of chemicals with a threshold quantity of 500 pounds. USEPA's 40 CFR 68.130 lists "hydrogen fluoride/hydrofluoric acid (conc 50% or greater)" with a 1,000 pound threshold quantity. "Hydrogen fluoride (anhydrous)" has been listed in RMP*Submit as a separate New Jersey-only chemical because it is important that NJDEP be able to discern between the anhydrous HF and the hydrofluoric acid (conc 50% or greater) since different threshold quantities need to be applied for each of them for registration and fee purposes. O/o's of stationary sources in New Jersey handling anhydrous hydrogen fluoride should select "hydrogen fluoride/hydrofluoric acid (conc 50% or greater)" from the RMP*Submit pick list for the RMP submitted to USEPA; however, "hydrogen fluoride (anhydrous)" should be selected from the RMP*Submit pick list for the RMP submitted to NJDEP.

Formaldehyde (gas), CAS # 50-00-0, is listed on New Jersey's list of chemicals. O/o's of stationary sources who handle pure formaldehyde (gas) that is not in an aqueous solution should select "formaldehyde (gas)" from the RMP*Submit pick list for the RMP submitted to NJDEP. If formaldehyde solution is handled, at any concentration, so that the amount of the pure formaldehyde in the solution exceeds the 1,000 pound threshold listed by the USEPA or 40 CFR 68.130, "formaldehyde (solution)" should be selected from RMP*Submit.

II. Procedure for making RMP Submittals to USEPA and NJDEP for facilities having both federally listed and state-only listed chemicals

A. Submit RMP to USEPA.

1. Run RMP*Submit. Include information only for the federally listed chemicals and thresholds. Follow all procedures as described in the USEPA's RMP*Submit User's Manual. Save the RMP to a diskette using the "submit" function of RMP*Submit. By default, RMP*Submit will download an ASCII file onto your diskette at A:\RMP.TXT, and a copy will be made at C:\RMPV107\UPLOADS\RMP.TXT. Submit this diskette containing the RMP.TXT file to USEPA.

B. Prepare RMP Submittal to be sent to NJDEP.

1. Go to the RMP*Submit application's Main Menu. Single click on the "Data Entry" key, which will bring you to the Data Entry screen. The RMP that was created for submittal to USEPA will be listed in the table titled "List of Risk Management Plans." In the "Description" field for that RMP, add text to identify it as the USEPA RMP. (A suggested example is "USEPA RMP version, XYZ Co., 3/2/99.")

2. Make a copy of the USEPA version RMP. To do this, single click on that RMP to highlight it; then single click on "File" at the menu at the top of the screen. Click on "Copy", then click "yes." An exact copy of the USEPA RMP version will be created and listed in the "List of Risk Management Plans" table.

3. Revise the description of the USEPA version RMP to identify it as the New Jersey version. To do this, single click on the RMP copy that you created to highlight it; then click on the field at the top of the table titled "Description (click here to change it)." Revise the RMP description. A suggested example is "NJ RMP version, XYZ Co., 3/2/99."

4. Select this NJ RMP version and edit it as described in the RMP*Submit User's Manual. Input all applicable data for the RMP required for New Jersey, i.e. chemicals, quantities, worst case and alternate case scenarios, etc. Follow the procedure to "submit" the NJ version RMP to a diskette. (When you do this, an ASCII file is saved by default as A:\RMP.TXT. At the same time, a copy of this file is saved by default at C:\RMPV107\UPLOADS\RMP.TXT. The file for all of the RMPs that you have created for the RMP*Submit application is found at C:\RMPV107\SRMPDATA.MDB.) Retain this diskette to be used with the New Jersey RMP Data Entry application.

C. Prepare the NJ-RMP for submittal to NJDEP.

1. Start the New Jersey RMP Data Entry application.

2. All of the RMPs created using RMP*Submit are automatically saved in a file by default at C:\RMPV107\SRMPDATA.MDB. If you are using the New Jersey RMP Data Entry application for the first time, you will be asked for the database path to this file. Click on the "Browse" button to locate and select C:\RMPV107\SRMPDATA.MDB. See Section 7.1, page 10, of the New Jersey RMP Data Entry User's Manual for a more detailed explanation.

3. Use the drop down list in the "New Jersey Specific RMP" field to select the RMP version to be loaded into the New Jersey RMP Data Entry application. Select the one

RMP that you created with the description for “NJ version” pursuant to steps II.B.3. & 4. above.

4. Complete all forms of the New Jersey RMP Data Entry application as described in Sections 7.2 through 7.5 of the New Jersey RMP Data Entry User’s Manual.

5. Follow the procedure to “check” and “submit” the NJ-RMP onto the same diskette described above at Step II.B.4. (When you “submit” the valid New Jersey RMP data, a copy of the data is saved as an ASCII file default at C:\NJ-RMP\UPLOADS\NJ-RMP.TXT. You will be asked whether you want to copy C:\NJ-RMP\UPLOADS\NJ-RMP.TXT to a diskette. Click “yes.” You will then be asked whether you wish to make another (archive) copy of C:\NJ-RMP\UPLOADS\NJ-RMP.TXT using a different name or path.) See Sections 7.1.2.3 and 7.1.2.5 of the New Jersey RMP Data Entry User’s Manual for more information on checking and submitting the New Jersey RMP data.

III. Procedure for making RMP Submittals to USEPA and NJDEP for facilities having only chemicals that are both federally and state regulated

The procedure is the same as in Part II above with one exception; it is not necessary to make a copy of the RMP as described at Steps II.B.2. & 3.

IV. Procedure for making RMP Submittals to NJDEP for facilities having only state-listed chemicals

This procedure applies to facilities that handle a chemical that is listed only in New Jersey’s list of Extraordinarily Hazardous Substances at N.J.A.C. 7:31-6.3(a), Table I, Part A, or if the facility is subject to the rule because its inventory of the chemical is at or above the threshold quantity specified at N.J.A.C. 7:31-6.3(a), Table I, Part A but below the threshold quantity specified at 40 CFR 68.130.

The procedure is similar to that described in Part II above. However, the following actions do not need to be taken:

1. The RMP diskette created pursuant to step II.A.1. should *not* be submitted to USEPA.
2. It is not necessary to make a copy of the RMP as described at Steps II.B.2. & 3.

V. Labelling the diskette sent to NJDEP

You must attach a label to each diskette (not the diskette’s jacket). The label must be typed or legibly handwritten. A sample label with the necessary information is shown below. Packaging and mailing options for submitting diskettes are left to your discretion.

RMP	
Stationary Source Legal Name	
TCPA ID # (if available)	
Date: 6/1/99	Disk 1 of 1
Contact: RMP Contact Name & Phone Number	

VI. Submitting your complete NJ-RMP Package

A. The NJ-RMP package must include at least two items:

1. The NJ-RMP submitted on a diskette which should contain two ASCII files:
 - i. RMP.TXT, completed using either RMP*Submit or a commercial RMP software product in the required format; and
 - ii. NJ-RMP.TXT, completed using the New Jersey RMP Data Entry application.(If you do not have the capability to submit electronically, you may submit your RMP using the federal RMP paper form found at Appendix A of the RMP*Submit User's Manual; staple all pages together and include a signed electronic waiver form found at Appendix B of the RMP*Submit User's Manual. The NJ-RMP paper form for the additional NJ registration information is found on the last two pages of this Appendix B. Include only 1 RMP on each diskette or form.
2. A certification statement, required at 40 CFR 68.185(b) as incorporated at N.J.A.C. 7:31-7.1(a), for the entire RMP, signed with an original signature and dated. A sample copy of the certification statement is found at Appendix C of the RMP*Submit User's Manual.

Submit only 1 RMP and accompanying certification statement per envelope to ensure that the certification statement is applied to the appropriate RMP.

B. Where to send the NJ-RMP package

Submit to:

Bureau of Chemical Release Information and Prevention
New Jersey Department of Environmental Protection
P.O. Box 424
Trenton, NJ 08625-0424